

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
Greenbelt Division**

SHADI HASSAN

Plaintiff,

v.

PASADEN RECEIVABLES, INC.
PEROUTKA & PEROUTKA, P.A.

Defendant

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Case No. 8:11-cv-03094-RWT

ANSWER TO COUNTERCLAIM

NOW COMES Plaintiff Shadi Hassan, through undersigned counsel, and files his Answer to Defendant's Counterclaim. In support he states as follows

1. Plaintiff ADMITS the truth of the allegations contained in Paragraph 1 of the Counterclaim.
2. Plaintiff ADMITS the truth of the allegations contained in Paragraph 2 of the Counterclaim.
3. Plaintiff ADMITS the truth of the allegations contained in Paragraph 3 of the Counterclaim.
4. Plaintiff DENIES the truth of the allegations contained in Paragraph 4 of the Counterclaim.

Defendant knew, or should have known about Plaintiff's bankruptcy discharge.

5. Plaintiff DENIES the truth of the allegations contained in Paragraph 5 of the Counterclaim.

Defendant knew, or should have known about Plaintiff's bankruptcy discharge.

6. Plaintiff DENIES the truth of the allegations contained in Paragraph 6 of the Counterclaim. 15

U.S.C. 1692e states that *any* false statement made in connection with the collection of a consumer debt is a violation of the statute.

7. Plaintiff DENIES the truth of the allegations contained in Paragraph 7 of the Counterclaim.

Plaintiff filed this Complaint solely to address Defendant's violations of the Fair Debt Collection Practices Act. Undersigned counsel does not engage in the business of debt collection and is not a competitor of Defendant.

8. Plaintiff DENIES the truth of the allegations contained in Paragraph 8 of the Counterclaim.
9. Plaintiff DENIES the truth of the allegations contained in Paragraph 10 of the Counterclaim.

10. Plaintiff DENIES the truth of the allegations contained in Paragraph 11 of the Counterclaim.
11. Plaintiff DENIES the truth of the allegations contained in Paragraph 12 of the Counterclaim.
12. Plaintiff DENIES the truth of the allegations contained in Paragraph 13 of the Counterclaim.
13. Plaintiff DENIES the truth of the allegations contained in Paragraph 14 of the Counterclaim.

WHEREFORE, Plaintiff requests that this Court deny Defendant's Counterclaim and for such further relief that this Court deems necessary and proper.

Respectfully submitted this 9th day of January, 2011,

/s/ Robinson S. Rowe

Robinson S. Rowe, Bar No. 27752

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was filed electronically this 9th day of January 2012. Notice of the filing will be sent to all parties by operation of the Court's electronic filing system.

Francis R. Laws

THOMAS & LIBOWITZ, P.A.

100 Light Street, Suite 1100

Baltimore, Maryland 21202-1053

/s/ Robinson S. Rowe